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Gold Coast Farms

Country of Origin Labeling Program
Agricultural Marketing Service, USDA
STOP 0249, Room 2092-S
1400 Independence Avenue, SW
Washington, DC 20250-0249

Attn: Desk Officer
Office of Management and Budget
New Executive Office Building
725 17th Street, NW - Room 725
Washington, DC 20503

Re: Country of Origin Labeling Recordkeeping System
Docket LS-02-16

The USDA Agricultural Marketing Service should not impose any recordkeeping regime that places an undue burden on the grower, shipper, wholesaler, or retailer. Current practices, for the most part, provide sufficient and readily available documentation to enable the appropriate regulatory agency to perform a trace back operation resulting from any investigation.

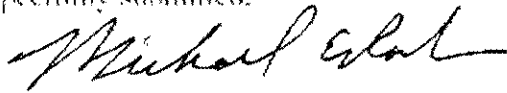
Additionally, a bill of lading accompanies all fresh produce shipments, which provides specific details such as commodity description, quantity, point of origin, and destination. A commercial invoice from the seller forwarded to the purchaser also provides specific detailed information in addition to the terms of sale. These two documents contain the thorough information necessary for an audit verification system from point of final sale back to the actual grower shipper.

Initially, the estimation of both the salary and hours stated by the USDA appear overstated. Further, since most of the documenting effort is already being performed by the various entities, the minor additional recordkeeping process should have a minimal impact on cost. Therefore, level of recordkeeping that may be required combined with existing systems invalidates the overstated projection of \$1,967,750,000. As previously indicated much of the information that would be required to verify any PACA audit is already in place. While some coordinating of recordkeeping may be necessary it certainly does not require the number of hours currently projected.

Presently grower, shipper, and packer records meet all the requirements of the COOL. Requiring the individual retail stores to maintain a paper trail going back to point of production would be completely unreasonable. Documentation describing the produce received can be connected to the individual store through the retail distribution warehouse or produce-buying office. In turn the distribution warehouse or buying office should have shipping/purchasing documents that identify the grower/shipper or importer, thereby allowing for a complete and verifiable audit.

While I strongly support Country of Origin Labeling, I firmly believe that most, if not all, the necessary documentation is in place to ensure compliance. Duplicating recordkeeping will not result in a more efficient audit verification system. Existing regulations administered by the PACA or U.S. labeling requirements on imported fresh produce should be sufficient to carry out any audit needed to verify country of origin.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Michael E. Egan". The signature is fluid and cursive, with a long horizontal stroke at the end.